**MIRIAM TAUBER LAW**

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October 7, 2019

Re: Microbot Med. Inc. v. Alliance Inv. Mgmt. Ltd., No. 1:19-cv-3782-GBD

**Request for 30-Day Extension of Deadline to Amend Pleadings/Add Parties
(and Other Case Deadlines), in View of Ongoing Discovery Dispute**

Dear Magistrate Judge Lehrburger:

Thank you for taking the time to hold the case conference last week to address the parties' dispute concerning discovery. The parties continue to discuss the terms of an appropriate protective order to be submitted for the Court's approval by October 9, 2019, as directed by the Court. (Dkt. 29.)

As discussed at the conference, Defendant Alliance has insisted on entry of a protective order prior to producing the discovery sought by Plaintiff, which Alliance has represented will substantiate Alliance's contention that Alliance's client Joseph Mona was the beneficial owner of the shares publicly reported as beneficially owned by Alliance. As further discussed, the parties anticipate that Plaintiff may seek to file a Second Amended Complaint adding Mr. Mona as a defendant (along with any other clients of Alliance appearing to have a beneficial ownership interest in the Microbot shares reported by Alliance) based on the discovery that Alliance expects to produce.

The deadline for Plaintiff to amend the Complaint or add parties is currently set for tomorrow, October 8, 2019. As detailed in Plaintiff's letter motion requesting the discovery conference held before the Court (Dkt. 22), Alliance has not yet responded to any of Plaintiff's outstanding discovery requests or produced a single document in this case, including the documents that Alliance has specifically represented will identify additional parties to be added as defendants.

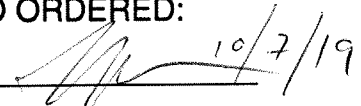
Accordingly, Plaintiff respectfully requests a 30-day extension of the October 8 deadline to amend the Complaint and add parties, and all other outstanding case deadlines as entered on the Case Management Plan (Dkt. 19.) A revised CMP reflecting this requested 30-day extension of all deadlines is attached to this letter. Alliance consents to the requested extension of the October 8 deadlines (CMP Paragraphs 2-3) and has no position as to Plaintiff's requested 30-day extension of the additional outstanding deadlines.

Very truly yours,

s/ Miriam Tauber

Miriam Tauber

Attorney for Plaintiff Microbot Medical Inc.

SO ORDERED:


HON. ROBERT W. LEHRBURGER

UNITED STATES MAGISTRATE JUDGE

cc: all counsel (via ECF)